

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

Jason Heath Knowles

(Enter above the full name of the plaintiff
or plaintiffs in this action.)

vs.

William Gupston JR / Shelby County Division of Corrections
Samuel Overton / Jenna Thomas
Gary Lartdale

(Enter above the full name of the defendant
or defendants in this action.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C., §1983

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes () No ()

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs: N/A

Defendants: N/A

2. Court (if federal court, name the district; if state court, name the county): N/A

3. Docket Number: N/A

4. Name of judge to whom case was assigned: N/A

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) N/A

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A

II. Place of Present Confinement: Shelby County Division of Corrections

A. Is there a prisoner grievance procedure in the institution?

Yes ☒ No ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ☒ No ☐

C. If your answer is Yes:

1. What steps did you take? Filed grievance, Talked to counselors, wrote personal letters to Deputy Administrator, Deputy of Operations, Security Admin, G.I.U. off. Guxton
2. What was the result? No Results, Major Retaliation from staff, Lost sentence credits

D. If your answer is No, explain why not: N/A

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff Jason Heath Knowles #255233Address SCDOC 1045 Mullins Station Road Memphis, Tenn 38134

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional defendants.)

B. Defendant Shelby County Division of Corrections/William Guxton is employed as Deputy Administrator at Shelby County Division of Corrections 1045 Mullins Station Mem. TN. 38134C. Additional Defendants: Please See "Attachment #1" Labeled as additional Defendants with Certificate of Services

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

G.I.U. Officer Latdole has made Defamatory statements and accusation of racism towards me starting on the 8th day of August 2015 and since has also received me as Aryan Nation in Gang Book and since the defamation of my character Threats of Bodily harm as well as Death threats have been made towards me. Officer J. Thomas has continuously made defamatory statements towards me in front of SCDOC staff as well as inmates which have put me in danger of retaliation and bodily harm. I have tried to address and correct the situation thru Inmate grievances as well as personal written letters to Deputy Administrators as well as all higher up Authority with no Response or Correction made.

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

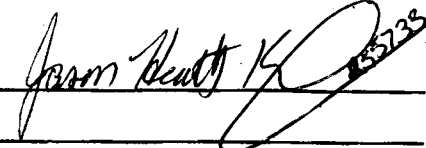
Order SCDC staff and administration to correct and make apology towards accusations made. My ~~reputation~~ character has been completely distorted so order a Relief of dollarred amount reasonable to help ~~defend~~ keep this from becoming an on going problem or from happening again. Restore all credits lost due to this and order protection from Retaliation from SCDC and all inmates and Order Officer involved to talk classes for sensitivity and Retain a Public Relation and the danger caused due to false accusations towards racism and discrimination, and make it mandatory with the opinion of attending or Resign their positions as SCDC officers.

VI. Jury Demand

I would like to have my case tried by a jury. Yes ☒ No ☐.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief.

Signed this 11 day of OCTOBER, 20 15.



Jason Heath Knowles #255733
(Signature of Plaintiff/Plaintiffs)